

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ZENIMAX MEDIA INC. and
ID SOFTWARE LLC,

Plaintiffs,

V.

OCULUS VR, LLC,
PALMER LUCKEY,
and FACEBOOK, INC.

Defendants.

CIVIL CASE NO. 3:14-cv-01849-P

**PLAINTIFFS' MOTION FOR A PROTECTIVE ORDER LIMITING THE
172 TOPICS IN DEFENDANTS' NOTICES OF RULE 30(B)(6) DEPOSITIONS**

Plaintiffs ZeniMax Media Inc. and id Software LLC hereby move the court pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure for an Order Limiting Defendants' Rule 30(b)(6) deposition notices. The grounds for this motion are set forth in the accompanying memorandum of law.

Dated: December 10, 2015

Respectfully submitted,

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Attorneys for Plaintiffs
ZeniMax Media Inc. and id Software LLC

CERTIFICATE OF CONFERENCE

On September 8, 2015 and November 13, 2015, the undersigned counsel for Plaintiffs ZeniMax Media Inc. and id Software LLC (collectively, "ZeniMax") conferred with counsel for Defendants regarding the relief requested by this Motion. On December 2, 2015 counsel for Defendants demanded that Plaintiffs move for a protective order to obtain any relief.

Dated: December 10, 2015

s/ P. Anthony Sammi

P. Anthony Sammi

CERTIFICATE OF SERVICE

On December 10, 2015, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case files system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

Dated: December 10, 2015

s/ Phillip B. Philbin
Phillip B. Philbin